

Exhibit A

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION CORPORATION, Plaintiff-Applicant, v. BERNARD L. MADOFF INVESTMENT SECURITIES LLC, Defendant.	Adv. Pro. No. 08-01789 (SMB) SIPA LIQUIDATION (Substantively Consolidated)
In re: BERNARD L. MADOFF, Debtor.	
IRVING H. PICARD, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC, Plaintiff, v. STEPHEN R. GOLDENBERG, Defendant.	Adv. Pro. No. 10-04946 (SMB)

STIPULATION FOR ENTRY OF SCHEDULING ORDER

WHEREAS, Irving H. Picard (the “Trustee”), as trustee for the liquidation of the business of Bernard L. Madoff Investment Securities LLC under the Securities Investor Protection Act, 15 U.S.C. §§ 78aaa, *et seq.*, and the substantively consolidated estate of Bernard L. Madoff, individually, and defendant Stephen R. Goldenberg (“Defendant,” and together with the Trustee, the “Parties”), by and through their respective counsel, and consistent with the authorization

provided by the Court at the May 31, 2017 pretrial conference permitting the Parties to file summary judgment motions pursuant to Local Bankruptcy Rule 7056, met and conferred regarding the following schedule.

IT IS THEREFORE MUTUALLY AGREED AND STIPULATED, by and between the Trustee and Defendants as follows:

1. The deadline for the Parties to file a Joint Statement of Undisputed Material Facts is July 26, 2017. In the event the parties cannot submit the Joint Statement of Undisputed Material Facts by this date, the Parties shall have a conference on July 26, 2017, at 10:00 a.m. before the Honorable Stuart M. Bernstein, United States Bankruptcy Court Judge, to inform the Court of their progress.
2. The deadline for the Parties to file their respective Motions for Summary Judgment (the “Motions”) will be 45 days after the Court approves the Joint Statement of Undisputed Material Facts.
3. The deadline for the Parties to file oppositions to the Motions will be 45 days after the deadline for filing the Motions.
4. The deadline for the Parties to file replies to the oppositions to the Motions will be 30 days after the deadline for filing oppositions to the Motions.
5. Oral argument on the Motions will be heard on a date to be set by the Court.
6. Except as expressly set forth herein, the Parties to this stipulation reserve all rights and defenses they may have, and no rights or defenses are waived by entering into this Stipulation.

Dated: June 21, 2017
New York, New York

BAKER & HOSTETLER LLP

/s/ Keith R. Murphy

MILBERG LLP

/s/ Matthew A. Kupillas

45 Rockefeller Plaza
New York, New York 10111
Telephone: (212) 589-4200
Facsimile: (212) 589-4201
David J. Sheehan
Email: dsheehan@bakerlaw.com
Keith R. Murphy
Email: kmurphy@bakerlaw.com

One Pennsylvania Plaza
New York, New York 10119
Telephone: (212) 594-5300
Facsimile: (212) 868-1229
Matthew A. Kupillas
Email: mkupillas@milberg.com
Birt Reynolds
Email: breynolds@milberg.com

*Attorneys for Irving H. Picard, Trustee for the
Substantively Consolidated SIPA Liquidation
of Bernard L. Madoff Investment Securities
LLC and the Estate of Bernard L. Madoff*

Attorneys for Defendant

SO ORDERED

**Dated: June 22, 2017
New York, New York**

**/s/ STUART M. BERNSTEIN
HONORABLE STUART M. BERNSTEIN
UNITED STATES BANKRUPTCY JUDGE**